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7 *Attorneys for Defendant,*
8 *TAB CONTRACTORS, INC.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 LANCE D. STUCKEY, JR., Individually and on
behalf of all others similarly situated,

12 Plaintiffs,

13 v.

14 APEX MATERIALS, LLC, ELKHORN
15 ENVIRONMENTAL, LLC, WERDO BC, INC.,
WERDCO LLC, BRENT CONRAD,
16 BRANDON CONRAD, PATRICIA CONRAD,
LAS VEGAS PAVING CORPORATION, TAB
17 CONTRACTORS, INC., WILLIAM CHARLES
CONSTRUCTION COMPANY, HARBER
18 COMPANY, INC., John Does I to XX, name
fictitious true name and number of persons
19 being unknown, and XYZ Corporations I to XX,
name fictitious true name of number of entities
20 being unknown,

21 Defendants.

Case No. 2:22-cv-01964-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANT TAB CONTRACTORS,
INC. TO FILE RESPONSIVE PLEADING
TO COMPLAINT**

[FIRST REQUEST]

22 Plaintiff, LANCE D. STUCKEY, JR. ("Plaintiff") and Defendant, TAB CONTRACTORS,
23 INC. ("Defendant") by and through their undersigned counsel, hereby agree and stipulate to extend
24 the time for Defendant to file a response to the Complaint from the current deadline of January 26,
25 2023, up to and including **March 27, 2023**. In exchange for the sixty (60) day extension to respond,
26 Defendant agrees not to dispute service of process.

27 This is the first request for an extension of time to respond to the Complaint. The request is
28

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1 necessary because counsel for Defendant was recently retained and needs additional time to
2 investigate the allegations and prepare a response to the Complaint. Further, the parties are exploring
3 possible early resolution of the matter. This request is made in good faith and not for the purposes of
4 delay.

5 Dated: February 21, 2023.

Dated: February 21, 2023.

6 /s/ Leon Greenberg, Esq.

/s/ Donna DiMaggio, Esq.

7 Leon Greenberg, Esq.

Nicole E. Lovelock, Esq.

8 Nevada Bar No. 8094

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15 *Attorneys for Plaintiff Lance D. Stuckey, Jr.*

Attorneys for Defendant Tab Contractors, Inc.

16 **IT IS SO ORDERED.**

17 
UNITED STATES MAGISTRATE JUDGE

18 Dated: February 21, 2023

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